

My name is Alan Goodman and I'm General Manager of a group of radio stations in the Columbus, Ohio, market. I have been in radio for 34 years, 30 of which have been management positions. Furthermore, I have run radio stations in New York City, Washington D.C., San Francisco California, Minneapolis Minnesota, Phoenix Arizona, and Denver Colorado. I have also been a Regional Manager for various companies and President of a radio company thus providing me with hands on experience in Portland Oregon, Boston Massachusetts, Seattle Washington, Miami Florida, Chicago Illinois, St. Louis Missouri, and Detroit Michigan. I was also an Operating Partner owning radio stations in 14 small markets with population counts of under 5,000 people in western Kansas.

In the early 1990's, on behalf of the United States Information Agency, I traveled to Lithuania to train future broadcasters in local radio and community involvement as that nation emerged from behind the "curtain" to privatize their local radio and television operations. During that time, while in Washington D, C. with a local radio station, I also organized the first local radio broadcast from the United States to the Soviet Union of a program called "Kids to Kids", where school kids from the United States spoke live with their counterparts in Moscow about issues that kids all over the world care about and surprisingly learned that their issues were quite similar with regard to education, racism, drugs, and politics.

As such, I have a rather unique perspective about "Radio" from a local perspective in small, medium, and large markets and international markets as well. And it is with these credentials I am joining the debate as to whether or not the FCC should grant to XM and Sirius and any other future satellite service the right to broadcast local news and traffic reports.

While considering your individual and joint decision with regard to this issue, one cannot and should not ignore history with regard to a multitude of regulatory decisions, which veterans of the industry adapted to over the past several decades.

In the middle 70's and early 80's when FM started to become the chosen medium for most of Americans, the prediction regarding the death of AM radio was premature. We, as an industry reinvented ourselves and discovered that an all news format, an all talk format and an all sports format, could be as successful ratings wise and financially as our sister FM music stations. The common denominator for the successful reinvention of AM radio was the programming of thousands of hours per month of local content whether it be news, talk or sports. Local communities gravitated to and became reliant on these formats to be kept informed. And as the eighties concluded, FM stations recognized the need to incorporate local content and public affairs programming as the packaging for their 24 hours of "more music...less talk" formats

In the early 80's the commission with great wisdom effectively deregulated the radio industry in terms of requiring a fixed commitment by licensees to run news and public affairs programming. The rationale for this decision was the recognition that it was in the broadcaster's best financial and ratings interest to participate aggressively in local affairs. The results of that decision was that today we are far more involved in the localization of our media than it was ever intended during the time in which it was mandatory. We have married our local communities simply because it made sense and cents to do so. It became a competitive advantage to do so.

In the 90's duopoly and later the effective deregulation of ownership rules was a new threat to our localized medium. The first wave of consolidation was

followed by the loss of a significant number of jobs in our industry. Single station managers became multiple station managers. News directors and news people are now an endangered species with one news voice providing news for multiple stations. And with the advance of technology, disc jockeys in Madison Wisconsin are now heard later in the day in Knoxville Tennessee. Some companies have taken this path while others such as mine have always maintained that "local broadcaster" defines the advantage for the local broadcaster. Just this weekend alone we had a staff of 20 people working a local jazz and blues festival for three days that attracted 70,000 people, a local concert "picnic with the pops" that drew 12,000 people, another jazz concert, and multiple appearances at fund raising "walks" and rallies for local charities. Next weekend and the 50 following will be much the same. And somewhere in between a 95-hour marathon for Children's Hospital, a marathon for Make A Wish, another for the Arthritis Foundation, food drives, and fund raises that are truly in the best interest of our local communities. And, while some of those other broadcasters are starting to realize that economies of consolidation doesn't always equate to more profitable operations, they too are returning to the roots that are our mainstay... localization of our product.

You have recognized, on multiple occasions, that the fragmentation and diversity of the media continues its fragmentation by the growth of music and news on the Internet, and the universality of cable television in households. And certainly each of these relatively new media plays a significant role in our culture. But none, including television, plays the important role of local radio.

As you know, each morning tens of millions awake to their favorite radio station so that they can take comfort in the fact that their world has changed little since the night before. They rely on us for weather and extreme weather at all hours of the day as well as entertainment throughout the day. And this has been the case for decades upon decades. Effectively we, radio, in many ways are a national treasure, an institution.

So if localization of our product is the advantage, you might ask why is the granting of permission to the satellite companies a threat to what we do? Or, why would it change what radio it is today? The answer is simply economics. I apologize for sounding condescending but the facts are what they are. Our financial success is dependent on the rates that we charge advertisers and those rates are determined by the size of our audiences. It is not dependent on running more commercials, for that tactic causes us to lose audience. If the satellite companies are allowed to compete with us locally, our audience levels will be fragmented, our operating incomes reduced, which, in return, will require us to reduce our operating expenses just to stay even with our profits from previous years.

However, this is not a case of asking you to protect us from competition. We face that daily within our industry. But satellite localized radio is not about an even playing field. Let's examine this scenario: We have one medium with commercial free entertainment, local news and information, better quality of sound, no restrictions on what they can broadcast and 180 channels with appeal to every segment of a community vs. a medium, which by necessity is commercial and filled with content called local programming that is perceived by many listeners as interruptions to their entertainment. The winner is local satellite radio and the loser is the community to which we are licensed. At a subscription rate of 10% of the households, these companies will earn tens of millions of dollars each month. They don't need to play on our playing field to be healthy, but we need them to stay where they are so that we can continue to

do what we have been doing for decades. We have been, and need to continue being, the glue that in so many ways holds our individual communities together.

Finally, as you can see from the above credentials, I've been doing this for a very long time. The one constant that I have seen in every local market that I have worked in as well as the international communities that I've touched is that we local radio broadcasters are a unique group of people. Yes, we enjoy good livelihoods and the ego gratification of working at some very special places. But in the end, we overwhelmingly take our responsibilities in our respective communities very seriously. We work 60, 70, 80 hours a week to insure that the product heard by our listeners is the very best that it can be, and that the product reflects where we live. A change in policy by the FCC regarding satellite radio will do nothing but harm to broadcasters in small and large markets alike. A change in policy by the F.C.C. regarding satellite radio as in the past will cause us to adapt to the new competition. And as a person with great passion for the role that radio plays in everybody's life, I fear that your ruling will force us to be more competitive with the satellite and less involved with our communities.

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